

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

WOMBLE BOND DICKINSON (US) LLP

Ericka F. Johnson (NJ #032162007)

Lisa Bittle Tancredi (*pro hac vice* pending)

1313 N. Market Street, Suite 1200

Wilmington, Delaware 19801

Telephone: (302) 252-4320

Email: ericka.johnson@wbd-us.com

Email: lisa.tancredi@wbd-us.com

Counsel for Ad Hoc Committee of States

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Case No.: 23-12825 (MBK)

Chapter: 11

Hon. Michael B. Kaplan

**DECLARATION OF ERICKA F. JOHNSON IN SUPPORT OF MOTION
OF THE AD HOC COMMITTEE OF STATES HOLDING CONSUMER PROTECTION
CLAIMS TO DISMISS CHAPTER 11 CASE**

I, Ericka F. Johnson, pursuant to 28 U.S.C. § 1746, declare, under penalty of perjury, that the following is true and correct:

1. I am a partner with the law firm of Womble Bond Dickinson (US) LLP, counsel to the Ad Hoc Committee of States Holding Consumer Protection Claims (the “Ad Hoc Committee”) in the above-captioned matter.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

2. I submit this declaration to place in the record on the *Motion of the Ad Hoc Committee of States Holding Consumer Protection Claims to Dismiss Chapter 11 Case* (the “Motion”)² certain documents submitted in connection with the Motion.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Amended and Restated Funding Agreement dated October 12, 2021 that was filed in LTL 1.0 at Docket No. 5.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Attorney Plan Support Agreement that was attached to the *Declaration of John K. Kim in Support of First Day Pleadings* in LTL 2.0 at Docket No. 4.

5. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of proceedings held on April 18, 2023 in the bankruptcy case *In re LTL Management LLC*, Case No. 23-12825 (MBK) (Bankr. D.N.J.).

6. Attached hereto as Exhibit 4 is a true and correct copy of the excerpts of the transcript of the deposition of Richard Dickinson taken on April 17, 2023, in connection with this matter.

I declare under penalty of perjury that the foregoing is true and correct. Executed in the State of Delaware on April 28, 2023.

/s/ Ericka F. Johnson
Ericka F. Johnson

² Capitalized terms used herein, but not defined herein shall have the meaning ascribed such terms in the Motion.